

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

Civil No. 11-10747

Honorable John Corbett O'Meara

Magistrate Judge Paul J. Komives

vs.

**SIXTY SEVEN THOUSAND SIX  
HUNDRED TEN DOLLARS (\$67,610.00)  
IN U.S. CURRENCY; AND TWENTY  
EIGHT THOUSAND FOUR HUNDRED  
TEN DOLLARS (\$28,410.00) IN U.S.  
CURRENCY;**

Defendants *in Rem*.

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**STIPULATION FOR ENTRY OF CONSENT JUDGMENT  
AND FINAL ORDER OF FORFEITURE**

WHEREAS, on or about February 24, 2011, Plaintiff UNITED STATES OF AMERICA filed a Complaint for Forfeiture against Sixty Seven Thousand Six Hundred Ten Dollars (\$67,610.00) in U.S. Currency; and Twenty Eight Thousand Four Hundred Ten Dollars (\$28,410.00) in U.S. Currency; (collectively, "defendants *in rem*"), seized in Flint, Michigan on or about October 6, 2011;

WHEREAS, claimant filed a claim and an answer to the Complaint for Forfeiture;

WHEREAS the plaintiff, the UNITED STATES OF AMERICA, and the claimant, LARON THORNTON, by and through his attorney, CHARLES DESOTELLE, wish to resolve this matter without further litigation and expense;

NOW THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff, UNITED STATES OF AMERICA, through its counsel, BARBARA L. McQUADE, United States Attorney, and JULIE A. BECK, Assistant United States Attorney, and Claimant LARON THORNTON, by and through his attorney, CHARLES DESOTELLE, as follows:

1) This action is a civil in rem forfeiture action brought pursuant to 21 U.S.C. § 881(a)(6).

2) This Court has jurisdiction and venue over this action pursuant to 28 U.S.C. §§ 1345, 1355 and 1395.

3) The allegations of the Complaint for Forfeiture are well taken, and the United States and its agents had reasonable cause for seeking forfeiture of the defendants *in rem* as provided in 28 U.S.C. § 2465. The Government's position in this action is substantially justified as provided in 28 U.S.C. § 2412(d)(1)(B).

4) Entry into this consent judgment does not constitute an admission of any criminal conduct on the part of Claimant LARON THORNTON.

5) The parties agree that \$26,020.00 of the defendants *in rem*, plus any interest on the defendants *in rem* that may have accrued since the seizure date, shall be **FORFEITED** to the United States of America pursuant to 21 U.S.C. § 881(a)(6). Further, any right, title or interest of Claimant LARON THORNTON, and his successors and assigns, and any right, title and ownership interest of all other persons in \$26,020.00, together with interest earned, if any, on the defendants *in rem*, is hereby and forever **EXTINGUISHED**, and that clear title to said sum shall hereby be VESTED in the United States, and the United States Marshals Service is **AUTHORIZED** to dispose of \$26,020.00, together with interest earned, if any, on the defendants *in rem* since the seizure date, according to law.

6) The parties stipulate that \$70,000 of the defendant currency, less any debt owed to the United States, any agency of the United States, or any other debt in which the United States is authorized to collect from the claimant, including but not limited to any debts collected through the Treasury Offset Program, shall **NOT** be forfeited, but shall be **RETURNED** to Claimant LARON THORNTON.

7) Following entry of this Consent Judgment and Final Order of Forfeiture, and receipt by the U.S. Attorney's Office of the claimant's social security number, and after claimant's attorney has supplied Automated Clearing House (ACH) information to the United States for electronic fund transfer, the United States Marshals Service (USMS) for the Eastern District of Michigan or his delegate shall disburse the funds through the Electronic Payment System (EPS) into the IOLTA account of claimant's attorney.

8) Claimant LARON THORNTON hereby knowingly and voluntarily waives any and all right to reimbursement by the United States of reasonable attorney fees and litigation costs in connection with this civil forfeiture action under 28 U.S.C. § 2465(b)(1)(A) or any other statute that might conceivably apply.

9) Claimant LARON THORNTON, agrees to release, remise and discharge Plaintiff, the United States of America, and any of its agencies involved in this matter, including the Drug Enforcement Agency and the United States Marshals Service, the United States Attorney's Office, and its agents, officers and employees, past and present, from all claims or causes of action which claimant and his agents, officers, employees, assignees and/or successors in interest have, may have had or may have on account of the events or circumstances giving rise to the above-captioned action.

10) Upon the making of the payment specified in paragraph 4 above, this case shall be

dismissed **WITH PREJUDICE** and closed.

11) Each of the parties to this Stipulation have discussed this settlement with their respective counsel, and fully understand its terms and conditions and the consequences of entering into it. The parties agree that each shall bear their own costs in this matter.

BARBARA L. McQUADE  
UNITED STATES ATTORNEY

s/Julie A. Beck  
Julie A. Beck  
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P53291

Dated: 2/3/2012

s/Charles Desotelle  
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[chuckdesotelle@yahoo.com](mailto:chuckdesotelle@yahoo.com)  
P46236

Dated: 2/12/12

s/Laron Thornton (signature page attached)  
LARON THORNTON  
Claimant

Dated:

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

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CURRENCY;**

Defendants *in Rem*.

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**CONSENT JUDGMENT AND FINAL ORDER OF FORFEITURE**

IT IS SO ORDERED.

Date: February 3, 2012

s/John Corbett O'Meara  
United States District Judge

10) Upon the making of the payment specified in paragraph 4 above, this case shall be dismissed **WITH PREJUDICE** and closed.


11) Each of the parties to this Stipulation have discussed this settlement with their respective counsel, and fully understand its terms and conditions and the consequences of entering into it. The parties agree that each shall bear their own costs in this matter.

BARBARA L. McQUADE  
UNITED STATES ATTORNEY

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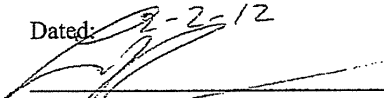
Dated:



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LARON THORNTON  
Claimant

Dated: